



BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

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July 29, 2002

Joelle J. Phillips
Attorney

615 214 6311
Fax 615 214 7406

TN REGULATORY AUTHORITY
DOCKET ROOM

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case
Proceeding to Declare Switching an Unrestricted Unbundled Network
Element*
Docket No. 02-00207

Dear Chairman Kyle:

Enclosed are the original and fourteen copies of a Joint Motion to Extend Filing Date in the captioned matter. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Joelle Phillips

(ch)

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case
Proceeding to Declare Switching an Unrestricted Unbundled Network
Element*

Docket No. 02-00207

JOINT MOTION TO EXTEND FILING DATE

BellSouth Telecommunications, Inc. ("BellSouth") and Petitioners¹ in the above-referenced docket ("Petitioners") jointly move the Hearing Officer to extend the filing deadline for rebuttal testimony in this docket. In support of their Joint Motion, the parties respectfully show the Hearing Officer as follows:

On June 28, 2002 the Hearing Officer appointed for this docket entered an Order resolving various discovery issues. Among the discovery issues resolved in that Order, the Hearing Officer addressed objections to the issuance of data requests by BellSouth to third parties. The Hearing Officer ruled that the Authority would proceed with third-party discovery by issuing Staff data requests. Those data requests have not yet been issued.

The parties recognize that information provided in response to the Staff data requests is likely to affect rebuttal testimony, and the parties will want to ensure that their rebuttal testimony addresses the information provided in response to staff

¹ Petitioners are: Access Integrated Network, Inc.; AT&T Communications of the South Central States, Inc.; Birch Telecom of the South, Inc.; Ernest Communications, Inc.; MCI metro Access Transmission Services, LLC; MCI WorldCom Communications, Inc.; New South Communications Corp.; and Z-Tel Communications, Inc.

data requests. If the current filing deadline is not altered, then the parties anticipate that they will need to seek leave to file additional rebuttal testimony when the third-party information is produced.

In order to avoid the need for such additional filings, the parties request that the filing deadline for rebuttal testimony, which is currently set for Friday August 2, 2002, be postponed to allow the parties to review third-party data responses prior to filing rebuttal testimony. In order to enable the parties to review the third party responses to data requests before filing rebuttal testimony, the parties request that the Hearing Officer set a status conference following the deadline for third parties to respond to the staff data requests, at which status conference the parties agree to be prepared to suggest a schedule for the filing of rebuttal testimony and hearing dates.

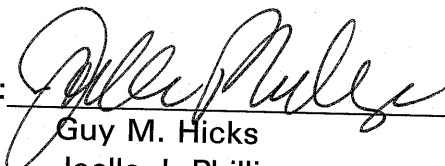
Respectfully submitted,

BELLSOUTH
TELECOMMUNICATIONS, INC.

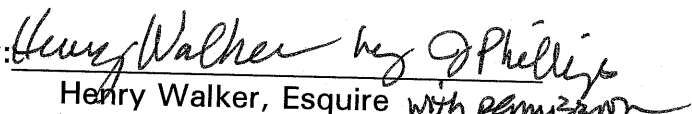
BOULT, CUMMINGS, CONNER &
BERRY

(Counsel for Petitioners)

By:


Guy M. Hicks
Joelle J. Phillips
333 Commerce St., Suite 2101
Nashville, TN 37201-3300
615/214-6301

By:


Henry Walker, Esquire *with permission*
Boult, Cummings, et al.
414 Union Street, #1600
Nashville, TN 37219-8062
615/252-2363

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

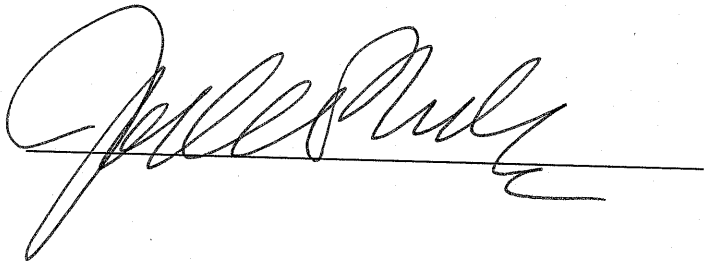
Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
hwalker@boultcummings.com

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farris-law.com

☒ Mail

Andrew O. Isar, Esquire
ASCENT
7901 Skansie Ave., #240
Gig Harbor, WA 98335

A handwritten signature in black ink, appearing to read "Andrew O. Isar", is written over a horizontal line.